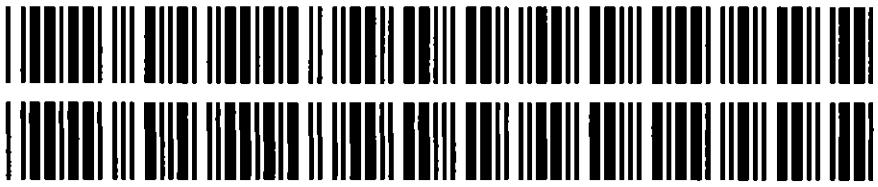
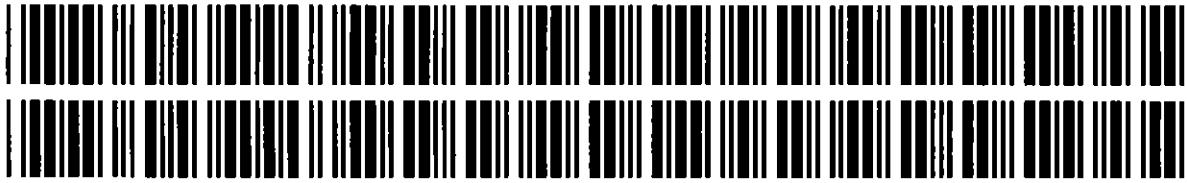


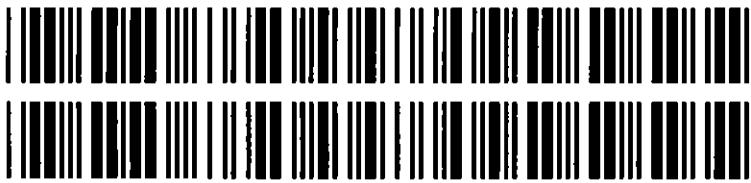
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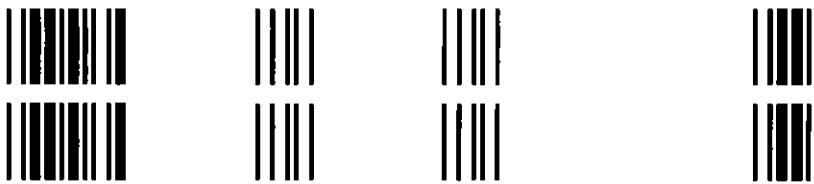
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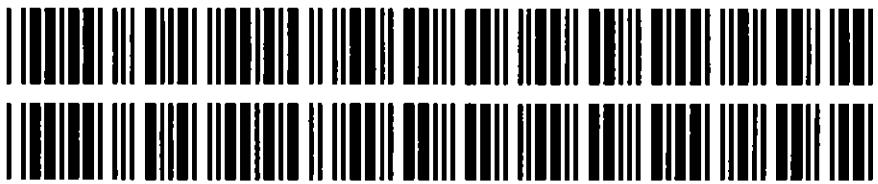
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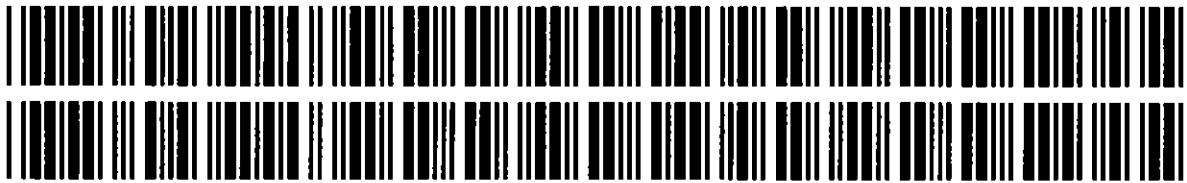
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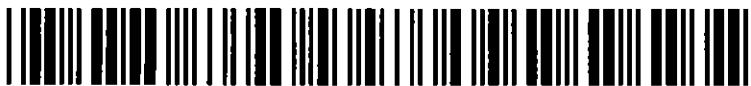
CV-S-00-0410



CV-S-00-0410-0001



03/31/2000



1 MITCHELL D. GLINER, ESQ.
2 Nevada Bar #003419
3 3017 West Charleston Boulevard
4 Suite 95
5 Las Vegas, NV 89102
6 (702) 870-8700
7 Attorney for Plaintiff

RECEIVED
MAY 31 11 48 AM '00
LANCE S. WILSON
CLERK
DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

8 SHARON KAY DOWNS nee SIMON, CV-S-00-0410-JBR-RJJ

9 Plaintiff,

10 vs.

11 BANK OF AMERICA N.T. & S.A.,)
12 d/b/a NATIONS BANK,)
13 Defendant.)

SIX PERSON JURY DEMANDED

LAW OFFICES
MITCHELL D. GLINER
3017 W. Charleston Blvd
Suite 95
Las Vegas, Nevada 89102
(702) 870-8700

14 COMPLAINT

15 JURISDICTION

16 1. The jurisdiction of this Court attains pursuant to the
17 FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental
18 jurisdiction. Venue lies in the Southern Division of the Judicial
19 District of Nevada as Plaintiff's claims arose from acts of the
20 Defendant perpetrated therein.

22 PRELIMINARY STATEMENT

23 2. The Plaintiff brings this action for damages based upon
24 Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C.
25 § 1681 et seq. (hereinafter referred to as "FCRA"), and of state
26 law obligations brought as supplemental claims.

27

28

1 3. Plaintiff is a natural person and is a resident and
2 citizen of the State of Nevada and of the United States. Plaintiff
3 is a "consumer" as defined by § 1681a(c) of the FCRA.

4 4. Defendant Bank of America N.T. & S.A., d/b/a Nations Bank
5 (BOA), is a furnisher of information as contemplated by FCRA
6 § 1681s-2(a) & (b), who regularly and in the ordinary course of
7 business furnishes information to one or more consumer reporting
8 agencies about consumer transactions or experiences with any
9 consumer.

FACTUAL ALLEGATIONS

12 5. Plaintiff's creditworthiness has been repeatedly
13 compromised by the acts, obduracy and general indifference of the
14 Defendant.

15 6. The debt underlying this action was incurred by
16 Plaintiff's former spouse during or before 1990. Plaintiff was a
17 co-signatory on that account.

18 7. Plaintiff's former spouse became a drug user and was
19 consequently divorced by Plaintiff. Despite the divorce,
20 Plaintiff's credit was completely undermined by her former spouse's
21 financial irresponsibility.

22 8. In 1998 Plaintiff set out to restore her credit. A copy
23 of Plaintiff's Equifax Credit Report, dated January 28, 1998, is
24 attached as Exhibit 1. Exhibit 1 reflects a collection account
25 assigned by the Defendant. Plaintiff disputed the account directly
26 with both Equifax and Defendant imparting that the subject account
27 was more than 7 years old.

1 9. The Defendant's account was deleted as a result of the
2 dispute. Plaintiff's Equifax Credit Report, dated May 8, 1998, is
3 attached as Exhibit 2 and reflects the deletion.

4 10. Plaintiff reviewed her credit two years later as a pre-
5 cursor to applying for new employment. A copy of the relevant
6 portion of Plaintiff's Equifax Credit Report, dated January 26,
7 2000, is attached as Exhibit 3.

8 11. Exhibit 3 reflects a rehabilitated credit history but for
9 the underlying account reassigned to collection with NCO Financial
10 Services, Inc. (NCO).

11 12. A copy of the relevant portion of the discovery relating
12 to Plaintiff's FDCPA suit against NCO is attached as Exhibit 4.
13 Exhibit 4 reflects that the account assigned to NCO was the same
14 one previously deleted subsequent to dispute with both Equifax and
15 Defendant.

16 13. A copy of Plaintiff's dispute to Experian, dated March 1,
17 2000, detailing the compromise of Plaintiff's Experian Report is
18 attached as Exhibit 5.

19 14. Defendant failed to investigate Plaintiff's dispute in
20 accordance with FCRA § 1681i. A furnisher of information cannot
21 simply re-verify. ". . . In a reinvestigation of the accuracy of
22 credit reports, a [furnisher of information] must bear some
23 responsibility for evaluating the accuracy of information
24 obtained . . ." Stevenson v. TRW, INC., 987 F.2d 288, 293 (5th
25 Cir. 1993).
26 . . .
27 . . .
28

LAW OFFICES
MITCHELL D. GLINER
3017 W Charleston Blvd
Suite 95
Las Vegas, Nevada 89102
(702) 870-8700

1 STATEMENT OF CLAIM AS AGAINST DEFENDANT

2 22. In the entire course of its action, Defendant willfully
3 and/or negligently violated the provisions of the FCRA in the
4 following respects:

5

6 a. By willfully and/or negligently failing to comport
7 with FCRA § 1681s-2(b).

8

9 PRAYER FOR RELIEF

10 THEREFORE, Plaintiff prays that the court grant the
11 following relief as against Defendant:

- 12 a) actual damages in the amount of \$100,000;
13 b) punitive damages in the amount of \$100,000;
14 c) attorney's fees; and
15 d) costs.

16 Respectfully submitted,

17
18
19 MITCHELL D. GLINER, ESQ.
20 Nevada Bar #003419
21 3017 West Charleston Boulevard
22 Suite 95
23 Las Vegas, NV 89102
24 Attorney for Plaintiff
25
26
27
28

EXHIBITS

Please press all 7's
corres, once to . address

EQUIFAX CREDIT INFORMATION SERVICES
P O BOX 740266
ATLANTA, GA 30374

(800)270-3436

SHARON K SIMON
618 S B ST
LAKE WORTH FL 33460

DATE 01/28/98
SOCIAL SECURITY NUMBER
DATE OF BIRTH 05/01/46

CREDIT HISTORY

Company Name	Account Number	When Acct.	Date Opened	Months Active	Date Of Last Activity	High Credit	Term	Amount on Date Reported	Days Due	Status	Date Reported
MIDLAND MORTGAGE REAL ESTATE MORTGAGE FHA MORTGAGE		I	07/86	28	12/97	69K	681	60K		I	12/97
WEST CAPITAL	1994 DECAF LEV- >>> PRIOR PAYING HISTORY - 30(00)60(00)90+(04)	I	05/07/92	039	039	039	05/12/97	NOT REPORTED 11/97 deleted 7 years	<<<		
J C PENNEY	deleted 7 years >>> PRIOR PAYING HISTORY - 30(01)60(01)90+(02)	I	06/89	05/91	257	257	257	R9	12/97		
BANC ONE	>>> PRIOR PAYING HISTORY - 30(01)60(00)90+(04)	I	11/87	10/91	2400	2871	2K+	R9	08/97		
	CHARGED OFF ACCOUNT										
	ACCOUNT CLOSED BY CREDIT GRANTOR										
MACY'S CALIFORNIA		(J)	10/84	03/98	238	239	239	19	11/98		
	>>> PRIOR PAYING HISTORY - 30(00)60(00)90+(02)										
	CHARGED OFF ACCOUNT										
	ACCOUNT CLOSED BY CREDIT GRANTOR										
MACY'S CALIFORNIA		(J)	10/84	03/98	854	239	239	239	R9	11/98	
	>>> PRIOR PAYING HISTORY - 30(00)60(00)90+(01)										
	CHARGED OFF ACCOUNT										
	ACCOUNT CLOSED BY CREDIT GRANTOR										
ZYL 7/04/1991 OPEN 7/09 (Bank 647)			07/88	01/92	0	21	21	21	R9	08/98	
MACY'S SOUTH											
	CHARGED OFF ACCOUNT										
	ACCOUNT CLOSED BY CREDIT GRANTOR										
BARNETT N LOW LOAN CO			12/88	88	10/94	18K	303	0	71	10/94	
	AUTO										
AMERICAN EXPRESS			08/88	04	05/91	3010	3010	3K+	09	11/93	
	CHARGED OFF ACCOUNT										
LORD & TAYLOR		I	09/87	09/91	472	0	0	09	09/93		
	>>> PRIOR PAYING HISTORY - 30(00)60(01)80+(03)										
	CHARGED OFF ACCOUNT										
CHASE NA		(J)	05/88	12/91	800	160	950	950	R9	07/92	
	>>> PRIOR PAYING HISTORY - 30(01)60(01)80+(03)										
	CHARGED OFF ACCOUNT										
	CLOSED ACCOUNT										
	Performance Capital										
	Settlement 9-16-98										
	>>> COLLECTION REPORTED 10/84: ASSIGNED 08/94 TO ECC MANAGEMENT SERVI (215)265-8800										
	CLIENT-NATIONS BANK CA: AMOUNT-\$2193: UNPAID : BALANCE-\$2193										
	DATE OF LAST ACTIVITY 08/84: ACCOUNT NUMBER 842218										
	1/12/92-72 0.0 maybe NATIONS 647 NO SUCH B&L 647 according to										
	>>>>> COLLECTION AGENCY NUMBER(S)										
	COLLECTOR 346546 philly										
	ECC MANAGEMENT SERVI(215)265-8800										
	475 NELSON PLACE RD.										
	MAIL CT PHILADELPHIA, PA 19110										
	***** ADDITIONAL INFORMATION *****										
	FORMER/OTHER ADDRESS 4415 ROARK, LAS VEGAS, NV 89124										
	LAST REPORTED EMPL - JC PENNEY										
	FORMER EMPLOYMENT - BARTENDER, J W LOUNGE										
	***** COMPANIES THAT REQUESTED YOUR CREDIT HISTORY *****										
01/28/98 EQUIFAX - DISCLOSURE											
12/01/97 PRM SPECIAL FINANCE											
09/05/97 PRM FIRST DEPOSIT/CG MAR											
07/16/97 AR 161BB052644											
05/17/97 PRM FIRST DEPOSIT/CG MAR											
03/14/97 PRM CAPITAL ONE											
12/02/96 WEST CAPITAL FINANCI											
11/07/96 FK WEST CAPITAL FINANCI											
10/14/96 WEST CAPITAL FINANCI											
08/05/96 ERMS-NORTH AUGUSTA-4											
01/23/98 AFFIRMATIVE RESEARCH											
11/08/97 RECEIVABLE SPECIALIS											
07/22/97 AR ASSOCIATES FIN CREDI											
07/15/97 PRM FIRST DEPOSIT/CG MAR											
04/23/97 RECEIVABLE SPECIALIS											
03/01/97 PRM SPECIAL FINANCE											
11/14/96 FK WEST CAPITAL FINANCI											
11/01/96 FK COMMERCIAL FINANCIAL											
09/10/96 VFS, INC											
08/17/96 WEST CAPITAL FINANCI											
THV-RESTART 00000											
COMPLETE PAGE 1 OF 1											



Please address all future
correspondence to:

Equifax Credit Information Services
P. O. Box 105518
Atlanta, GA 30348
1(800) 440-5059

CREDIT FILE

Personal Identification Information

May 8, 1998

Sharon K Downs
6325 Shawnee Av
Las Vegas, NV 89107

Social Security #:
Date of Birth: May 5th, 1946

Previous Address(es):
618 S B St, Lake Worth, FL 33460
4415 Roark, Las Vegas, NV 89124

Formerly Known As: Sharon K Simon

Last Reported Employment: JC Penney
Previous Employment(s): Bartender, J W Lounge

Credit Account Information

Company Name	Account Number	Whose Acct	Date Opened	Months Reviewed	Date of Last Activity	High Credit	Terms	Items as of Date Reported			Date Reported
								Balance	Past Due	Status	
American Express CHARGED OFF ACCOUNT	I		09/89	4	09/91	\$3010		\$3010	\$3010	09	11/93
Banc One CHARGED OFF ACCOUNT ACCOUNT CLOSED BY CREDIT GRANTOR	I		11/87		10/91	\$2400		\$2871	\$2871	R9	08/97
Barnett N RGN Loan 0 AUTO	J		12/89	58	10/94	\$18215	303	\$0		I1	10/94
Burdines ACCOUNT CLOSED BY CREDIT GRANTOR CHARGE	U		09/87		03/98	\$0		\$0		R1	03/98
Capital One CREDIT CARD	I		01/98	1	03/98	\$100	10	\$65		R1	03/98
Chase Na	J		05/88		12/91	\$800	160	\$950	\$950	R9	07/92
Previous Payment History: 1 Time 60 days late; 3 Times 90+ days late											
Previous Status: 12/91 - R5; 11/91 - R5; 10/91 - R4											
CHARGED OFF ACCOUNT CLOSED ACCOUNT											
Levitz/Cecap ACCOUNT TRANSFERRED OR SOLD	I		11/86		11/91	\$939		\$0		R	02/98
Lord & Taylor CHARGED OFF ACCOUNT	I		09/87		09/91	\$472		\$0		09	09/93

Credit Account Information - Continued

Company Name	Account Number	Whose Acct	Date Opened	Months Reviewed	Date of Last Activity	High Credit	Terms	Items as of Date Reported			Date Reported
								Balance	Past Due	Status	
Macy's California	J	10/84		03/96	\$238	239		\$238	\$238	I9	04/98
Previous Payment History: 2 Times 90+ days late											
Previous Status: 10/96 - I5; 09/96 - I5											
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Macy's California	J	10/84		03/96	\$854	239		\$239	\$239	R9	03/98
Previous Payment History: 1 Time 90+ days late											
Previous Status: 10/96 - R5											
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Macy's South	I	07/89		01/92	\$0	21		\$0	\$0	R9	03/98
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Midland Mortgage	I	07/86	31	03/98	\$68920	681		\$59472		I1	03/98
REAL ESTATE MORTGAGE											
FHA MORTGAGE											

Companies that Requested your Credit File

05/08/98 Equifax - Update	04/21/98 Sprint
04/16/98 Equifax - Disclosure / ACIS 810617988	03/07/98 Equifax - Update
03/04/98 Equifax - Update	02/11/98 Equifax - Disclosure / ACIS 804206398
02/03/98 Equifax - Disclosure / ACIS 803408862	01/28/98 Equifax - Disclosure
01/21/98 Affirmative Research Unilimite	12/01/97 PRM-Creative Auto Finance
11/03/97 Receivable Specialist Inc	09/05/97 PRM-First Deposit/Cg Marketin
07/22/97 AR-Associates Fin Credit Card	07/16/97 AR-Associates Fin Credit Card
07/15/97 PRM-First Deposit/Cg Marketin	05/17/97 PRM-First Deposit/Cg Marketin
04/23/97 Receivable Specialist Inc	12/02/96 West Capital Financial Servic
11/14/96 FK-West Capital Financial Ser / WSTCPTFNCL	11/07/96 FK-West Capital Financial Ser / WSTCPTFNCL
11/01/96 FK-Commercial Financial / COMCL FINC	10/14/96 West Capital Financial Servic
09/10/96 VFS, Inc	08/05/96 ERM Atl Med-Nagars
05/17/96 West Capital Financial Servic	

Pier address & future
car indece : is address

EQUIFAX CREDIT INFORM 7N SERVICE
P O BOX 740256
ATLANTA, GA 30374

(800)405-0081

SHARON KAY DOWNS
6325 SHANNEE AV
LAS VEGAS NV 89107

DATE 01/26/00
SOCIAL SECURITY NUMBER

TELEPHONE (702) 878-4829

CREDIT HISTORY

Company Name	Account Number	When Acct.	Date Opened	Months Re- viewed	Date Of Last Activity	High Credit	Terms	Status as of Date Reported		
								Balance	Prev Due	Status
FLEET REAL ESTATE FU REAL ESTATE MORTGAGE		I	10/98	14	12/99	62K	648	59K		II 12/99
FLEET REAL ESTATE FU REAL ESTATE MORTGAGE FHA MORTGAGE		J	10/98	14	12/99	76K	587	75K		II 12/99
NETWORK FEDERAL CRED: CONSUMER CREDIT COUNSELING		I	08/99	03	12/99	18K	264	17K		II 12/99
NETWORK FEDERAL CRED: PAID ACCOUNT/ZERO BALANCE		I	11/98	12	07/99	14K	245	0		II 12/99
MACY'S EAST/GECCCC ACCOUNT CLOSED BY CONSUMER CHARGE		I	07/89	09	07/98	0		0		R1 12/99
BURDINES/FDSNB ACCOUNT CLOSED BY CREDIT GRANTOR CHARGE		U	09/87	03		0		0		R1 12/99
RNB-MERVYN'S CHARGE		I	02/99	03	05/99	286	13			R1 06/99
FIRST SECURITY BANK PAID ACCOUNT/ZERO BALANCE AUTO		I	11/98		12/98	15K	255	0		IO 12/98
MIDLAND MORTGAGE PAID ACCOUNT/ZERO BALANCE REAL ESTATE MORTGAGE		I	07/86	38	08/98	69K	678	0		II 10/98
MACY'S WEST/GECCCC ">>>> PRIOR PAYING HISTORY - 30(00)60(00)90+(02)10/96-15.09/96-15 SETTLEMENT ACCEPTED ON THIS ACCOUNT ACCOUNT CLOSED BY CREDIT GRANTOR		J	10/84		03/96	0	119	0		19 07/98
MACY'S WEST/GECCCC ">>>> PRIOR PAYING HISTORY - 30(00)60(00)90+(01)10/96-R5 PAID CHARGE OFF		J	10/84		03/96	854	239	0		R9 05/98
BARNETT N RGM LOAN Q AUTO		J	12/89	98	10/94	18K	303	0		II 10/94
>>>>>>>> COLLECTION REPORTED 09/99; ASSIGNED 06/99 TO NCG GROUP (800)266-5613 CLIENT-NCG GREAT TRUST; AMOUNT-\$3160; UNPAID ; BALANCE-\$4318 DATE OF LAST ACTIVITY 06/95; INDIVIDUAL; ACCOUNT NUMBER 8388 CONSUMER DISPUTES-REINVESTIGATION IN PROCESS										
>>>>>>>> COLLECTION AGENCY TELEPHONE NUMBER(S) <<<<<<<<										
NCG GROUP	(800)266-5613									
***** ADDITIONAL INFORMATION *****										
FORMER/OTHER ADDRESS 618 S B, ST, LAKE WORTH, FL, 33460										
FORMER/OTHER ADDRESS 4419 ROARK, LAS VEGAS, NV, 89124										
FORMER NAME - SHARON K SIMON										
LAST REPORTED EMPL - PALACE STATION										
FORMER EMPLOYMENT - BARTENDER, J W LOUNGE										
***** COMPANIES THAT REQUESTED YOUR CREDIT HISTORY *****										
01/26/00 EQUIFAX - DISCLOSURE						01/12/00 ACIS D01210188 915AA00018				
12/29/99 PRM-DIRECT LENDING SOURC						12/26/99 EQUIFAX - DISCLOSURE				
12/23/99 AR FLEET REAL ESTATE FU						10/16/99 PRM HOUSEHOLD FINANCE CO				
09/30/99 PRM PROVIDIAN BANCORP						09/14/99 PRM HOUSEHOLD FINANCE CO				
08/26/99 PRM PROVIDIAN BANCORP						08/08/99 AR BASE SCORE PROJECT				
07/12/99 PRM PROVIDIAN BANCORP						06/10/99 AR FLEET REAL ESTATE FU				
05/07/99 AR CTW LLC						04/23/99 PRM PROVIDIAN BANCORP				
03/18/99 PRM PROVIDIAN BANCORP						02/28/99 PRM CAPITAL ONE				
02/19/99 PRM PROVIDIAN BANCORP						02/08/99 AR FLEET REAL ESTATE FU				
02/02/99 AR FEDERAL HOME LOAN MO						01/29/99 AR FIRST SECURITY BANK				
11/12/98 EQUIFAX - DISCLOSURE						11/07/98 BANK OF AMERICA				
10/10/98 EQUIFAX - UPDATE						09/17/98 ACIS B26003599 915AA00018				

1 SANDRA E. JACKSON, ESQ.
2 Nevada Bar No. 7033
3 EARLEY SAVAGE
4 7251 West Lake Mead Blvd, Suite 550
5 Las Vegas, Nevada 89128
6 (702) 388-0113
7 Attorneys for
8 NCO FINANCIAL SYSTEMS, INC.

9
10
11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 SHARON KAY DOWNS,

14 Plaintiff,

15 v.

16 NCO FINANCIAL SYSTEMS, INC., a
17 foreign corporation

18 Defendant.

19 CV-S-00-0163 - PMP -RLH

20 **DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST SET OF**
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

21 TO: SHARON KAY DOWNS, Plaintiff; and

22 TO: MITCHELL D. GLINER, ESQ., Plaintiff's attorney.

23 Pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, Defendant NCO
24 FINANCIAL SYSTEMS, INC., hereby responds to Plaintiff's FIRST SET OF
25 INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS:

26 **INTERROGATORY NO. 1:** Please state the name, work and home addresses and
27 telephone numbers, and position of the person responding hereto.

28 **RESPONSE TO INTERROGATORY NO. 1:** Steven Leckerman, Chief Operating Officer,
c/o NCO Financial Systems, Inc., 515 Pennsylvania Avenue, Ft. Washington, (716) 691-5400.

INTERROGATORY NO. 2: State the name, current work and home addresses and
telephone numbers, and position of each person consulted by you, and identify each document
referred to by you in the preparation of your Answers to these Interrogatories.

ANSWER TO INTERROGATORY NO. 2: OBJECTION to the extent that this response

EARLEY SAVAGE
7251 West Lake Mead Blvd., Suite 550
Las Vegas, Nevada 89128
Telephone (702) 388-0113
Fax (702) 388-1713

1 involves attorney client privilege or other protected matters. Without waiving such objection, the
2 party identified in the preceding interrogatory has reviewed the collection file in this matter.

3 **INTERROGATORY NO. 3:** State your full name, your business purpose and your form of
4 business organization (e.g. corporation, partnership, sole proprietorship, etc.) Your current net worth
5 and your gross receipts for past three years.

6 **ANSWER TO INTERROGATORY NO. 3:** The defendant's name is NCO FINANCIAL
7 SYSTEMS, INC., its form of business organization is a corporation, and it is a collection agency.
8 OBJECTION as to request for past three years gross receipts as proprietary, overbroad, burdensome
9 and irrelevant as past earnings cannot reasonably lead to relevant information on the issue of punitive
10 damages, the only issue for which plaintiff can conceivably be seeking such information.
11 OBJECTION as to request for net worth as such information is proprietary, overbroad, burdensome,
12 irrelevant. Such request is, additionally, premature because entitlement to punitive damages is an
13 issue of law and defendant anticipates filing a motion for summary judgment on this issue, the
14 determination of which will likely preclude any entitlement to such information. In the event that
15 disclosure of such information is required, defendant will be seeking a protective order prior thereto.

16 **INTERROGATORY NO. 4:** State whether there is any insurance agreement under which
17 any person carrying on an insurance business may be liable to satisfy part or all of the judgment
18 which may be entered in this action or to indemnify or reimburse for payments made to satisfy any
19 judgment which may be entered in this action, and identify all documents reflecting the existence of
20 such insurance agreement.

21 **ANSWER TO INTERROGATORY NO. 4:** Yes. Insurance declaration page.

22 **INTERROGATORY NO. 5:** Identify the persons or entities which are the creditor(s)
23 regarding any debts which you have attempted to collection from Plaintiff, identify all documents
24 related or relevant to your contractual agreement(s) or other business relationships with said person
25 or entities, identify each person who has had any contact or communication on your behalf with said
26 person or entities regarding Plaintiff or the debt underlying this action, state when, how, where, and
27 with whom said contact or communication occurred and in detail and with particularity the substance
28 thereof, and identify all documents relevant or related thereto.

ANSWER TO INTERROGATORY NO. 5: The debt originated at NationsBank, was sold as part of a portfolio. It was thereafter held by Global Rated Eligible Asset Trust and serviced by Commercial Financial Services, Inc. Upon institution of bankruptcy proceedings, In Re: Commercial Financial Services, Inc., Case No. 98-05162-R and CF/SPC NGU, Inc., Case No. 98-05166-R, the United States Bankruptcy Court, District of Oklahoma, approved NCO FINANCIAL SYSTEMS, INC., to collect certain accounts, including the subject debt. See attached Revocable Power of Attorney executed in furtherance thereof. Other documents relevant to the debt and the aforesaid proceedings may be found in the office of the Clerk of the Bankruptcy Court.

INTERROGATORY NO. 6: Identify all documents related or relevant to any purported debts owed by Plaintiff to you for the underlying creditor, and describe in detail and with particularity each event, payment, contact or communication relevant or related to the collection by you of said debts from Plaintiff.

ANSWER TO INTERROGATORY NO. 6: OBJECTION on the grounds that the interrogatory is vague, ambiguous, overbroad, and vexatious. Additionally, discovery is continuing. Without waving defendant's objection, see Power of Attorney, Fact Sheet and sample notification letter attached hereto which was mailed to plaintiff prior to December 3, 1999. See also, letter to plaintiff found as Exhibit 1 to the complaint, which was mailed to her on or about December 3, 1999. Upon receipt of plaintiff's notice of dispute, NCO ran a magnetic tape by which it requested deletion. No telephone calls were made to, or received from, plaintiff.

INTERROGATORY NO. 7: For each person who has had any involvement in any manner in any efforts on your behalf to collect or attempt to collect any debt purportedly owing by Plaintiff, state his/her name, any aliases used, position, home and work addresses and telephone numbers, and the nature and purpose of his/her involvement, describe each action taken, the nature, contents and subject matter of each discussion or conversation held, and the time, place and date of each such action or conversation; and identify all documents relevant, related to or reflecting said involvement of each such person.

ANSWER TO INTERROGATORY NO. 7: Company representatives include Carol Anton, correspondence clerk, and Steven Leckerman, Sr., Chief Operating Officer. They may be found at

March 1, 2000

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

EXPERIAN
ATTENTION: NCAC
P.O. Box 2104
Allen Texas 75002

Re: SHARON KAY DOWNS/CREDIT DISPUTE

Dear Sir:

This letter is a dispute under FCRA § 1681i. I enclose page 2 of my Experian Report, dated February 17, 2000. I provide my required identifying information:

Name:	Sharon Kay Downs
Spouse's First Name:	Richard M. Simon (former husband)
Present Home Address:	6325 Shawnee Avenue Las Vegas, Nevada 89107
Previous Addresses: (for last 5 years including Zip Codes)	6325 Shawnee Avenue Las Vegas, Nevada 89107
Social Security Number:	530-32-5057
Year of Birth:	1946

The debt which NCO Financial Systems is attempting to collect is approximately 10 years old. I neither had nor used a credit card from May, 1991 - January 19, 1998. NCO has procured a time-barred debt and is attempting to collect the same by providing false data concerning its date of origin.

Please delete this information. It has already been deleted from both my Equifax and Trans Union Credit Profiles.

Sincerely,

SHARON DOWNS

Enclosure

experian

Prepared for
SARON KAY DOWNS
Report number
2854173362

Report date
February 17, 2000
Questions?
Call 800.563.4080

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Information affecting your creditworthiness

Items listed with dashes before and after the number, for example --1--, may have a potentially negative effect on your future credit extension and are listed first on the report.

Credit grantors may carefully review the items listed below when they check your credit history. Please note that the account information connected with some public records, such as bankruptcy, will appear with your credit accounts listed later in this report.

Credit information about you

<i>Source/ Account number (except last few digits)</i>	<i>Date opened/ Reported since</i>	<i>Date of status/ Last reported</i>	<i>Terms/ Monthly payment</i>	<i>Responsibility</i>	<i>Credit limit or original amount/ High balance</i>	<i>Recent balance/ Recent payment</i>	<i>Comments</i>
--1- NCO FINANCIAL SYSTEMS IN 515 PENN AVE PHILADELPHIA PA 19144 ...8	6-1999/ 6-1995	6-1995/ 11-1999	Installment/ NA SO	Individual	\$3,160 / NA	\$4,315 as of 11-1999/ as of 11-1999.	Status: collection account. \$4,315 past due. Account history: Collection as of 11-1999, 6-1995 This account is scheduled to continue on record until 6-2002.

Original creditor: NCO/GREAT TRUST